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July 3, 2025

BY ECF

Hon. Justin T. Quinn
United States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

ORDER

Re: *Doe v. Rutgers, Civ. No. 23-22385 (ZNQ)(DEA)*

Dear Magistrate Judge Quinn:

This firm and Offit Kurman, P.A., represent Plaintiff in the above-referenced action. We write on behalf of both parties to request an extension of discovery deadlines in this matter. The parties are currently discussing a potential resolution of this matter. Plaintiff provided an updated settlement demand on June 16, 2025. Rutgers is currently evaluating Plaintiff's demand, but that process has been slowed by vacation schedules and business travel. Plaintiff has also suffered a steep decline in his mental health that has prevented him from participating in discovery in this matter. In order to provide the parties with additional time to explore a potential settlement without expending unnecessary discovery resources, the parties hereby request that the Court enter an Order extending the remaining discovery deadlines as follows:

- All fact discovery, including any third-party depositions, is to be complete by October 1, 2025 (previous deadline – August 1, 2025)
- The Parties shall identify their “Case-in-Chief Experts” by October 29, 2025 (previous deadline – August 29, 2025)
- The Parties shall identify their “Rebuttal Experts” by November 26, 2025 (previous deadline – September 26, 2025)

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- The Parties shall exchange Case-in-Chief Expert Reports by December 31, 2025 (previous deadline – October 31, 2025)
- The Parties shall exchange Rebuttal Expert Reports by February 2, 2026 (previous deadline December 1, 2025)
- All expert discovery (including expert depositions) shall be concluded by March 30, 2026 (previous deadline January 30, 2026)

This is the first time the parties have requested an extension of discovery deadlines in this matter.

In consideration of the foregoing, the parties respectfully further request that the Court adjourn the status conference currently scheduled for July 14, 2025, and instead set a deadline for the parties to file a joint status update by July 14, 2025. The joint status update will include the parties' respective positions with regard to a settlement conference and, if the parties agree to engage in a settlement conference, dates on which the parties are mutually available to participate in a settlement conference.

We thank the Court for its attention to this matter.

Respectfully,

/s/ Grant R. Cornehl
Grant R. Cornehl

cc: Amy L. Piccola, Esq. (*via* ECF)
Levi R. Schy, Esq. (*via* ECF)
James A. Keller, Esq. (*via* ECF)

It is SO ORDERED this 8th day of July, 2025.



JUSTIN T. QUINN, USMJ